

EPA ELECTRONIC MAIL MESSAGE

Date: 31-Aug-1995 01:02pm EDT
 From: GROUP REGION03-TAT
 REGION03-TAT
 Dept: (OSWER,OERR,ERD) (C)
 Tel No: 609-461-4003

TO: GROUP RRC (RRC)
 TO: GROUP REGION03-TAT (REGION03-TAT)
 TO: GROUP ERD-OERR (ERD-OERR)

Subject: PENINSULA PLATING POLREP #3

POLREP #3
 PENINSULA PLATING CO. EMERGENCY ASSESSMENT
 EAST 7TH AVENUE AND RIVER ROAD, RT. 5 BOX 1 C
 BLADES, SUSSEX COUNTY, DE 19973
 ATTN: GREGG CRYSTALL, JOHN RILEY

ABANDONED ELECTROPLATING SHOP EMERGENCY ASSESSMENT

- I. SITUATION: MONDAY, 0900 HOURS, 08/07/95
 - A. AT 1540 HOURS ON 08/03/95, JOHN MOHRMAN OF THE DELAWARE DEPARTMENT OF NATURAL RESOURCES AND ENVIRONMENTAL CONTROL (DNREC) REQUESTED EPA ASSISTANCE FOR AN EMERGENCY ASSESSMENT AT PENINSULA PLATING CO., AN ABANDONED ELECTROPLATING FACILITY IN BLADES, SUSSEX COUNTY, DELAWARE. DNREC OBTAINED A SEARCH WARRANT AND SECURED THE FACILITY. OSC STEUTEVILLE WAS ASSIGNED THE SITE.
 - B. AT 1615 HOURS ON 08/03/95, THE ROY F. WESTON TECHNICAL ASSISTANCE TEAM (TAT) WAS TASKED BY OSC STEUTEVILLE TO RESPOND TO THE SITE BY 0900 HOURS ON 08/04/95, AND PERFORM AN EMERGENCY ASSESSMENT. THE TASKS INCLUDED COLLECTING BACKGROUND INFORMATION, ASSEMBLING DOCUMENTS, AIR MONITORING, AND COLLECTING AND FIELD TESTING SAMPLES.
 - C. AT 1730 HOURS ON 08/03/95, THE OSC NOTIFIED TAT THAT ACCESS TO THE SITE WAS OBTAINED FOR VISUAL AND PHOTO-DOCUMENTATION PURPOSES AND COLLECTION OF SAMPLES FOR FIELD TESTING ONLY. NO SAMPLES COULD BE COLLECTED FOR LABORATORY ANALYSIS AT THIS TIME. THE OSC FAXED TAT A COPY OF THE SITE REPORT PROVIDED BY DNREC WHICH INCLUDED A LIST OF CHEMICALS ON SITE WHICH INCLUDED HEXAVALENT CHROMIUM, CHROMIC ACID, NICKEL SULFATE, COPPER SULFATE, ZINC CYANIDE, HYDROGEN PEROXIDE, ETC. THESE CHEMICALS WERE EITHER IN OPEN VATS IN THE PLATING AREA OR IN DRUMS IN THE DRUM STORAGE AREA. ACCORDING TO DNREC AN ESTIMATED 1397 GALLONS OF ACIDS, 311 GALLONS OF CAUSTIC AND 25 GALLONS OF ZINC CYANIDE ARE IN OPEN VATS AND 345 GALLONS OF ACIDS, 9 GALLONS OF CAUSTIC, 165 GALLONS OF ZINC CYANIDE, 15 GALLONS OF 35% HYDROGEN PEROXIDE AND 220 GALLONS OF OTHER CHEMICALS ARE IN APPROXIMATELY 24 DRUMS.
 - D. PERSONNEL: EPA-1, TAT-3, DNREC-5, BLADES FIRE DEPARTMENT-1, BLADES POLICE DEPARTMENT-1, MORRIS PROPERTIES-1.
 - E. WEATHER: CLEAR, LIGHT WINDS, TEMPERATURES IN THE HIGH 90'S.
 - F. POLREP #3 UPDATES POLREP #1 WITH ADDITIONAL TECHNICAL DETAILS FROM THE TAT LOGS.

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II. ACTIONS TAKEN:

- A. AT 0830 HOURS, ON 08/04/95, TAT ARRIVED AT THE SITE, WAS BRIEFED BY DNREC OFFICIALS, AND ASSESSED THE SITE. THE BUILDING IS THREE STORIED AND LOCATED IN A MIXED RESIDENTIAL/INDUSTRIAL SETTING. ON THE SOUTH SIDE OF EAST 7TH STREET THERE ARE RESIDENCES AND A SCHOOL WITHIN 200 YARDS OF THE SITE. THE BUILDING ITSELF IS DIVIDED INTO TWO UNITS; THE WESTERN PART IS OCCUPIED BY PENINSULA PLATING CO. AND THE EASTERN PART IS OCCUPIED BY SEAFORD DISPOSAL, A WASTE DISPOSAL COMPANY. IMMEDIATELY OUTSIDE THE NORTHERN BOUNDARY OF THE PROPERTY, THERE ARE TWO DRINKING WATER WELLS OPERATED BY THE CITY OF BLADES. THE NANTICOKE RIVER FLOWS WITHIN ONE QUARTER OF A MILE NORTH OF THE SITE. TAT OBSERVED THAT THERE IS NO RETAINING WALL ON THE NORTH SIDE OF THE BUILDING TO CONTAIN ANY CHEMICAL IN CASE OF A SPILL. A BUSINESS THAT OPERATES A FOOD VENDING SERVICE IN THE AREA IS LOCATED IMMEDIATELY WEST OF THE FACILITY.
- D. AT 0915 HOURS, DNREC JOHN MOHRMAN ARRIVED ON SITE. HE INFORMED TAT THAT BEFORE INVENTORYING THE CHEMICALS ON SITE ON 08/03/95, DNREC PERFORMED AIR MONITORING AND DID NOT OBSERVE ANY LEVEL OF CONCERN. TAT TOURED THE 2ND FLOOR OF THE BUILDING WITH MR. MOHRMAN. BESIDES SOME PIPING FROM THE PLATING AREA AND A PLASTIC CONTAINER WITH A YELLOWISH LIQUID IN A ROOM, THERE WAS NOTHING SIGNIFICANT IN THE 2ND FLOOR. THERE WAS PRACTICALLY NO 3RD FLOOR INSIDE THE BUILDING.
- E. AT 1000 HOURS, OSC STEUTEVILLE ARRIVED ON SITE. HE INFORMED DNREC OF THE ACCESS PROBLEM. DNREC OFFICIALS BRIEFED HIM ON THE SITE. THE OSC ASKED DNREC ABOUT OWNERSHIP OF THE BUSINESS AND THE PROPERTY SO THAT HE CAN CONTACT THE RIGHT PERSON FOR ACCESS PERMISSION.
- DNREC INFORMED THE OSC THAT THE PLATING OPERATION HAS BEEN OPERATING SINCE 1992 AND HAS SINCE CHANGED MANAGEMENT. PENINSULA PLATING IS A TENANT LEASING BUILDING SPACE ON A LARGER PROPERTY. THE LATEST OPERATORS WERE MR. JOHN DONOWAY AND TWO OTHER INDIVIDUALS. MR. DONOWAY OPERATED THE PLATING BUSINESS UNTIL APRIL 95 BEFORE THE ABANDONMENT OF THE BUSINESS. THE BUILDING WAS USED AS A WAREHOUSE BEFORE 1992.
- F. AT 1015 HOURS, WILLIAM HILL, DNREC CHIEF OF ENFORCEMENT, ARRIVED ON SITE. HE INFORMED OSC THAT DNREC IS WORKING ON A IMMINENT HAZARD ORDER.
- G. AT 1045 HOURS, THE BLADES FIRE CHIEF EARL CHAFFINCH ARRIVED ON SITE. AT 1100 HOURS, BLADES POLICE CHIEF PAUL VIEHMAN ARRIVED ON SITE. BOTH THE FIRE AND POLICE CHIEF INFORMED OSC THAT IN JULY THERE WAS A MYSTERIOUS FIRE IN A DUMPSTER AT THE SITE. THEY ALSO OBSERVED CHILDREN PLAYING WITH MATCHES AROUND THE SITE. THE BUILDING IS NOT SECURE AND THE WINDOWS CAN BE OPENED EASILY FROM OUTSIDE. DNREC ENTERED THE BUILDING THROUGH THE WINDOWS. A DOOR TO THE UPPER FLOORS IS LOCKED, BUT CAN BE EASILY JIMMIED WITH A SCREW DRIVER. THE BUILDING CAN BE ENTERED THROUGH THE WINDOWS OR A DOOR WITHOUT FORCING THE DOORS OR WINDOWS. THERE IS A HISTORY OF THEFT AND VANDALISM ON SITE. THE FIRE CHIEF INFORMED OSC THAT THE LOCAL FIRE DEPARTMENT IS NOT EQUIPPED TO HANDLE AN EMERGENCY SITUATION AT THIS SITE IF A FIRE WAS TO OCCUR.
- H. DNREC INFORMED OSC THAT SOME CUSTOMERS WHO SENT PARTS FOR PLATING TO THE FACILITY VISITED THE SITE ON 08/03/95 AND DEMANDED THEIR PARTS. THE POLICE CHIEF INFORMED EPA AND DNREC THAT 5 CUSTOMERS ALREADY REGISTERED CASES WITH THE POLICE.

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- I. AT 1055 HOURS, TAT PERFORMED AIR MONITORING AND NO SIGNIFICANT LEVEL ABOVE BACKGROUND WAS INDICATED.
- J. AT 1105 HOURS, MR. KEN EAST, NEPHEW OF SARAH MORRIS ARRIVED ON SITE AND MET WITH THE OSC. HE INFORMED THE OSC THAT MR. FRANK TAYLOR OF WILMINGTON TRUST MANAGES THE TRUST FOR SARAH MORRIS. WILMINGTON TRUST ALSO COLLECTS RENT FROM ALL TENANTS ON THE PROPERTY. THE LAW FIRM OF RICHARDS, LAYTON & FINGER WORKS AS THE ATTORNEY FOR WILMINGTON TRUST, AND MR. FREDERICK L. COTTELL HANDLES THE CASE. MR. EAST PRESENTED THE OSC AN ESTIMATE SUBMITTED TO WILMINGTON TRUST BY WIK ASSOCIATES, AN ENVIRONMENTAL COMPANY, FOR CLEAN UP OF THE ENTIRE PROPERTY. BUT THE PHASE I ENVIRONMENTAL AUDIT DID NOT MENTION THE ELECTROPLATING FACILITY.
- K. DNREC INFORMED THE OSC THAT THE FACILITY HAD A DISCHARGE PERMIT ISSUED BY SUSSEX COUNTY WHICH HAVE BEEN REVOKED ON MAY 30, 1995. DNREC CLOSED THE DISCHARGE ON 08/03/95 BY POURING CONCRETE INTO THE DRAIN SYSTEM IN FRONT OF THE BUILDING.
- L. AT 1130 HOURS, TAT SET UP A MINI-RAM IN THE PLATING ROOM FOR DUST MONITORING. READINGS WERE NOT SIGNIFICANT. AT THIS TIME TAT PREPARED FOR COLLECTION OF SAMPLES FROM THE VATS AND DRUMS FOR FIELD TESTING. TAT MARKED THE VATS "A" THRU "I" AND PLANNED TO COLLECT SAMPLES FROM FIVE VATS. TAT ALSO PLANNED TO COLLECT SAMPLES FROM THREE DRUMS.
- M. AT 1150 HOURS, THE OSC OBTAINED PERMISSION FROM WILMINGTON TRUST TO COLLECT SAMPLES FOR LABORATORY ANALYSIS.
- N. AT 1200 HOURS, TAT COMPLETED COLLECTION OF FIVE SAMPLES FROM VATS AND THREE SAMPLES FROM DRUMS FOR FIELD TESTING. ALL SAMPLES WERE COLLECTED IN LEVEL "C" PROTECTION. DURING SAMPLE COLLECTION, TAT OBSERVED INCOMPATIBLE CHEMICALS STAGED IN DRUMS IN THE DRUM STORAGE AREA.
- O. AT 1320 HOURS, TAT COMPLETED FIELD TESTING OF ALL SAMPLES COLLECTED. RESULTS ARE AS FOLLOWS:
 - VAT "A", LABELED "COPPER ACID BATH", CONTAINED A CLEAR BLUE LIQUID WHICH HAD pH OF ZERO AND TESTED POSITIVE FOR OXIDIZER.
 - VAT "C", LABELED "CAUSTIC SOLUTION", CONTAINED A CLOUDY WHITE LIQUID WITH SOAPY BUBBLES AND FLAKES ON BOTTOM OF THE VAT. THIS LIQUID HAD A pH OF 11.
 - VAT "F" CONTAINED AN UNKNOWN OILY LIQUID WITH WHITE RESIDUE: 98% LIQUID AND 2% RESIDUE SOLID. BOTH THE LIQUID AND THE RESIDUE HAD A pH OF ZERO AND TESTED POSITIVE FOR OXIDIZER.
 - VAT "K" HAD A CLEAR LIQUID WITH A pH OF 7 AND TESTED NEGATIVE FOR OXIDIZER, PEROXIDE AND CYANIDE.
 - VAT "I", LABELED "ZINC CYANIDE", CONTAINED A CLEAR GREENISH LIQUID WITH A pH OF 14 AND TESTED POSITIVE FOR CYANIDE.
 - ONE DRUM WITHOUT A LID LABELED AS "CHROMIC ACID SALT" CONTAINED A RED/BROWN SOLID SLUDGE. THE SLUDGE HAD A pH OF ONE AND TESTED POSITIVE FOR OXIDIZER.
 - A 30 GALLON BLACK POLY DRUM, LABELED "HYDROGEN PEROXIDE" CONTAINED A CLEAR LIQUID. THE LIQUID HAD A pH OF 5 AND TESTED POSITIVE FOR OXIDIZER AND PEROXIDE.
 - THE LAST DRUM SAMPLED WAS LABELED AS "NICKEL CHLORIDE" AND CONTAINED A CLEAR LIQUID. THE LIQUID HAD A pH OF THREE AND TESTED NEGATIVE FOR OXIDIZER.
- P. AT 1415 HOURS, THE OSC CONSULTED THE EPA MANAGEMENT AND DISCUSSED THE NEED FOR SUPERFUND RESPONSE ACTION. THE OSC ACTIVATED \$200K IN EMERGENCY REMOVAL ACTIVATION FUNDS.

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- Q. AT 1445 HOURS, THE OSC TASKED ERCS TO PROVIDE A 24-HOUR GUARD SERVICE FOR THE SITE.
- R. AT 1510 HOURS, THE OSC DIRECTED TAT TO COLLECT A TOTAL OF SIX SAMPLES FOR LABORATORY ANALYSIS. A TOTAL OF FOUR SAMPLES TO BE COLLECTED FROM THE VATS AND TWO SAMPLES TO BE COLLECTED FROM DRUMS. THE SAMPLES ARE TO BE ANALYZED FOR pH, COPPER, NICKEL, CHROMIUM, ZINC, OXIDIZER AND REACTIVE CYANIDE FOR CONFIRMING THE FILED TEST DATA.
- S. AT 1605 HOURS, TAT COMPLETED COLLECTION OF ALL SIX SAMPLES FOR LABORATORY ANALYSIS. TAT COLLECTED ALL SAMPLES IN LEVEL "C" PROTECTION. DURING COLLECTION OF SAMPLES, TAT PHOTO-DOCUMENTED INDIVIDUAL VATS AND DRUMS SAMPLED. TAT COMPLETED THE REQUIRED CHAIN-OF-CUSTODY FORMS FOR THE SAMPLES. THE SAMPLES WILL BE TAKEN TO THE TAT OFFICE AND DELIVERED TO A LABORATORY FOR ANALYSIS AS SOON AS A LABORATORY IS ARRANGED.
- T. AT 1715 HOURS, THE OSC SECURED ALL ACCESS TO THE BUILDING AND PLACED BANNER GUARD.
- U. AT 1730 HOURS ON 08/04/95, TAT AND DNREC DEPARTED SITE.
- V. AT 1800 HOURS, BENNETTE GUARD SERVICES, SALISBURY, MD, WHO WAS CONTRACTED BY ERCS, ARRIVED ON SITE AND TOOK OVER THE SECURITY OF THE SITE.
- W. AT 1830 HOURS ON 08/04/95, THE OSC AND ALL OTHER PERSONNEL DEPARTED SITE.

III. FUTURE ACTIONS:

- A. OSC TO CONTACT SUPERFUND ENFORCEMENT SECTION FOR POSSIBLE INVESTIGATION OF POTENTIALLY RESPONSIBLE PARTY(IES).
- B. OSC TO MAINTAIN CONTACT WITH STATE AND LOCAL OFFICIALS.
- C. TAT TO ARRANGE LABORATORY FOR SAMPLE ANALYSIS AND DELIVER THE SAMPLES.

 BILL STEUTEVILLE, OSC
 EPA REGION III
 PHILADELPHIA, PA

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